

California School-Based MAA Manual

SECTION 6

MAA Time Survey

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Determining Which Staff Should Time-Survey

To determine which LEA staff might time-survey, two factors must be considered:

1. Determine which staff perform MAA, and
2. Ensure that appropriate nonfederal funds are expended for MAA in order to receive federal reimbursement.

To determine which staff performs MAA, it is necessary to work with the relevant LEA management and/or administrative staff to discuss both claimable MAA and the various activities performed by staff under the various district or COE programs. It is important to match up the various LEA activities with MAA to ensure that the appropriate staff members are selected. A staff listing or organization chart is helpful to identify LEA functions, staff classifications, and lines of supervision.

Once the potential staff classifications are selected, ensure that sufficient appropriate nonfederal funds are expended to receive federal reimbursement for the costs of the selected staff. Staff positions that are funded 100-percent by federal dollars may not participate in the MAA program, because the Federal Government is already paying its share of costs. Staff may not participate in the MAA program in the proportion of which their positions are federally funded.

When a staff member performs MAA for multiple claiming units in the same district, they may have one original survey for each claiming unit. Or if the staff member's time will be entered on multiple invoices, the staff member say only time survey once, even if they have multiple job classifications. If the individual's time survey is included in multiple invoices, copies of the single time survey that identifies the amount of time worked for each claiming unit must be clearly marked as such and must have an original signature.

When staff members perform MAA, in an entire fiscal year, the LEA must either time-survey four quarters or time-survey three quarters and average one quarter. Staff must time-survey to be included in the invoice. If the staff member is not going to perform MAA, but provides support to staff who time-survey to MAA, the costs of the supporting staff member whose salaries and benefits are coded with SACS function codes 2700 and 700-7199 (School Administration and General Administration) are claimable on an allocated basis through the allocated cost pool. Otherwise, if the costs of the supporting staff member are not coded in the School Administration and General Administration function range, then his or her salary and benefits will not be claimable and will fall into the non-MAA Cost Pool.

Time Survey Process

The MAA time survey is the basis of the claim for federal funds, and its completion must be done with strict controls on how it is conducted and how time is recorded.

The time survey is a representative sample of staff's work, which is to be used as the basis of the MAA claim. To claim for an entire year, the LEA must time survey, with the survey time periods randomly selected by DHCS. The LEC/LGA shall be notified no later than the first day in May annually of the first-quarter time survey period. The DHCS-selected second-, third-, and fourth-quarter survey weeks will be reported to the LEC/LGA 45 days before the beginning of the new quarter.

The LEA can average the time survey results of any quarter in a fiscal year. Only staff that have completed surveys in 3 quarters may be included in the averaging quarter. The LEA may only average one quarter per year. The averaging quarter cannot be chosen after surveys are completed. Completed surveys must be used for that quarter. If an LEA time surveys for a particular quarter, the LEA cannot choose to use the average for that quarter.

To submit averaged invoices you must either submit all four invoices to DHCS at one time or you must have previously submitted invoices that will be used for the averaged quarter.

Averaged Quarter Invoicing Methodology

If the LEA chooses to average a quarter, a weighted average will be used to calculate claims for the averaged quarter. The time survey results for all staff in a claiming unit that surveyed three quarters will be averaged by the claiming unit. Those individual staff positions that are not time surveyed for three quarters must time survey in the averaged quarter in order to be included in the averaged quarter invoice. The results would be averaged using a weighted average. For instance, a claiming unit consists of five staff. Three staff time surveyed the first 3 quarters, Staff person #4 hasn't time surveyed at all, and Staff person #5 time surveyed the second and third quarter. Staff persons' #4 & #5 must time survey the fourth quarter. Their results would then be averaged into results from the existing average for quarters 1, 2, and 3, using a weighted average. See below for example:

Staff	1	2	3	4	5
Time Survey	1 st , 2 nd , 3 rd qtr	1 st , 2 nd , 3 rd qtr	1 st , 2 nd , 3 rd qtr	Hasn't time surveyed 1 st , 2 nd , or 3 rd quarter	Time surveyed 2 nd and 3 rd quarter
MAA time for one activity	Average 11.2 hours	Average 11.2 hours	Average 11.2 hours	15.5 hours	21 hours
Weighted Average	11.2+11.2+11.2+15.5+21 = 70.1; 70.1/5=14.02 hrs for one activity; 14.02 /40 (40 in this example is the average paid hours for included staff)= 35.02%				

This calculation must be performed for all activities, MAA and non-MAA. The total time recorded on the survey must total to 100 percent of the staff member's work hours. Claiming units may begin claiming during any quarter of the fiscal year if they participate in the time survey week. If a claiming unit wishes to begin claiming during the averaged quarter, they must time-survey during the randomly selected fourth-quarter time survey week.

Unless their costs are direct-charged, all staff that will participate in MAA must complete the time survey. All new staff must participate in training that helps them understand the various MAA activity codes before they participate in their first time survey.

Training should be conducted close to the week prior to the time survey. Once trained, all staff who time-survey must participate in an annual time survey training. Annual time survey training may not be claimed during any time survey week by the LEC/LEA or LEA coordinator or by the time survey participants.

In each time survey week, all participants must use the same version of the time survey, either the hard copy format or the electronic format. If the claiming unit chooses the hard copy format, participants may complete it in pencil; however, each time survey must be signed in BLUE INK (but not in black ink). Electronic time surveys must also be signed in non-black ink BLUE INK. The time participants enter on the time survey must be paid time only, and sufficient supporting documentation must be maintained that verifies that the hours participants were paid equals the amount of time they surveyed. Staff should time-survey daily to ensure accuracy.

Time survey participants may make corrections to the time survey until the results are entered into the invoice. Once the results are entered into the invoice, no further time survey changes may be made. Do not use whiteout on the time survey: all errors must be thoroughly erased or stricken through, corrected, and initialed.

Time Survey Documentation

Each participant identified on the Claiming Unit Functions Grid, whose costs are not direct charged, must time-survey for five days during the designated quarterly time survey week. When school is:

- Students in session, staff must time survey for five consecutive days, excluding Saturdays, Sundays and Holidays.
- Students out of session on the first day of each of the time survey period, or for fewer than 30 days, then participants must time-survey on the first day when school resumes and time survey for five consecutive days, excluding Saturdays, Sundays and Holidays.
- Students out of session on the first day of the time survey period, or for more than 30 days, then participants must begin the time-survey six days from when

the regular school year resumes and time-survey for five consecutive days, excluding Saturdays, Sundays, and holidays.

The time survey activities found in Section 5 require that each participant code only the hours paid according to their contract during the five-day survey week, capturing all activities and using the correct codes. (For example, a participant works a 10-hour day but is only paid for eight hours. The participant should only code 8 hours, starting with the first paid hour of the work day.) Although hours worked might exceed the paid hours MAA is reimbursement only for paid hours. Each participant must provide a minimum of two specific samples on the back of the survey of any activities they performed in Codes 4, 6, 8, 10, 12, 14, and 15. The original time survey will be retained in each claiming unit audit file.

Local and regional MAA coordinators are responsible for ensuring that staff complete time surveys during the time survey period. Coordinators must also help staff complete their time survey forms accurately and verify via the sample documentation that staff have completed the forms correctly before placement in the audit file. Audit files are subject to state and federal review.

Time Survey Administration

The responsibility for proper administration of MAA Time Surveys is shared by the individual participant, the participant's supervisor, the LEA MAA Coordinator, the LEC/LGA MAA Coordinator, and DHCS.

The time survey process, form, and training summary have been approved by CMS. Significant changes in the MAA program require prior review by CMS.

DHCS designates the time survey periods, issues the time survey form and training materials, trains LEC/LGA MAA Coordinators, and reviews time survey forms and the operational plan and/or the audit file during site visits.

LEC/LGA MAA Coordinators assist DHCS by training LEA MAA Coordinators on the MAA program, time survey, and audit file. They provide DHCS materials and updates to the local coordinators.

LEA MAA Coordinators are responsible for training all time survey participants, reviewing each time survey form for completion and correctness, ensuring that the surveyed activities are claimable, and maintaining the original time survey forms in the claiming unit audit file. The supervisor of the time survey participant verifies that the number of paid hours recorded are the actual hours paid and that the activities are within the participant's job classification. Each time survey participant attends time survey training to learn which MAA activities are within their scope of work and how to properly document their paid time. Each individual is responsible for completing the form as instructed.

Time Survey Review Process

For compliance assurance, DHCS requires the three-step process before inclusion in the invoice.

1. Site Supervisors of Time Survey Staff

The first review will be by the Supervisor. He/she will review for the following:

- (1) samples are completed for MAA codes;
- (2) hours indicated are the employees paid workday; and
- (3) all totals are accurate and complete.

If the Supervisor finds problems with a survey they must be corrected by the participant and returned to the Supervisor. Once approved by the Supervisor they are forwarded to the LEA MAA Coordinator.

2. LEA MAA Coordinators and Surveying Staff Site Supervisors

The second review is more comprehensive and includes the careful review of samples, training dates, job description and other elements which must align with the Operational Plan (OP). When problems are found which require correction or further training the LEA Coordinator contacts the individual participant. The surveying participant must correct their survey, and/or be provided with additional training as necessary. Only the survey participant can provide corrections in relation to the clarification of sample activities and/or amount of time per code. If the survey cannot be corrected and is invalid, it must be removed from the time survey results. *Sample activity descriptions on each time survey form must maintain a minimum of 80% accuracy for the unit to meet audit compliance.* Time surveys that have not been corrected prior to inclusion into that quarterly invoice *must* be removed from that quarter invoice.

3. LEC/LGA MAA Coordinators

It is the responsibility of the LEC/LGA Coordinators who signs the invoice and claiming grid to assure the accuracy of the time surveys, and compliance with the school-based claiming manual. **Each LEC/LGA will conduct reviews of LEA claiming units every 3 years.** These reviews should consist of desk and field reviews of all completed time surveys and any training materials used by the LEA. This review function shall be performed by the LEC/LGA, and cannot be subcontracted.

The following must be performed by the LEC/LGA Coordinator:

- Attend time survey trainings conducted by or for LEAs.
- Hold LEA Coordinator meetings following time survey periods to enhance LEA Coordinator review of surveys.
- Develop, coordinate or provide additional time survey training as necessary before each quarter.
- Identify regional/county time survey questions and seek clarification through the LEC Committee and approval through the DHCS.
- Identify random LEAs for operational plan review and audit file compliance.

Role of Vendors

Vendors may be used by LEAs to help them administer the MAA program.

Examples of what vendors may do:

- Conduct training for time survey, operational plan and invoice.
- Prepare LEA invoices for LEA signature.
- Review time surveys only at the LEA level.

Examples of what vendors may not do:

- Perform LEA site reviews at the LEC/LGA level.
- Perform LEA time survey reviews at the LEC/LGA level.
- Retain LEA audit file.

The LEA is ultimately responsible for all claims, deferrals, and disallowances.

DHCS School-Based MAA Unit Reviews

Quarterly, randomly selected LECs and LGAs will be required to submit the sign-in sheets from the LEC/LGA time survey training and 50 completed time surveys. DHCS will perform an initial desk review followed by site reviews as warranted. Upon timely conclusion of the review a final written report reflecting positive and negative findings and recommendations for improved performance will be issued to the LEC and LGA Coordinators.

Time Survey Review Standards

At each level of review, verification of compliance will include but not be limited to:

- Clean, legible recording of hours or portions of hours for the entire paid workday.
- Correct totaling of MAA and Non-MAA hours.
- Correct sample descriptions for MAA activities. The MAA activity must be referenced in staff duty statement.
- Signature and date of participant and supervisor *before submitting an invoice*.

Each level of review will conduct field reviews that include the following:

- Matching the individual's job classification on the time survey to their job classification on the claiming grid.
- Training rosters showing date survey staff was trained.
- Comparison of paid contract hours with. surveyed hours.
- Review of audit binders.

Non-Compliant Surveys

Time surveys that do not meet the above standards will not be allowed for claiming in that invoice quarter, and cannot be used to average the remaining quarter results.

LEA MAA Time Survey Form

The LEA MAA Time Survey Form has been developed using MS Office/Excel and can be downloaded from the MAA website at www.dhcs.ca.gov/maa. The hard copy format of the form is available in Appendix G. Only the DHCS-approved time survey form may be used. Diskettes with forms may be provided to claiming units so that staff may use the electronic version, print it out when completed, sign it in blue ink, and turn it in to the appropriate supervisor for signature and maintenance in the local audit file.

Direct-Charging in Lieu of Time-Surveying

Staff who perform MAA Medi-Cal Coordination, Claims Administration, Training and Fiscal Coordination are not required to time-survey. However, to qualify for direct charge reimbursement, participants must certify 100 percent of their time spent and be able to provide documentation that supports this percentage. Documentation should include the method of keeping time records. Ongoing time records or logs would provide a good audit trail and would allow the claiming unit to claim for actual costs, which might vary each quarter. An overhead or indirect rate, established according to OMB A-87 principles, may be applied to personnel expenses. Staff duty statements must show that these activities are part of their job.

Note: Staff who perform MAA Medi-Cal Coordination, Claims Administration, and Training and who also perform other MAA must time-survey.

The MAA OP requires the retention of position descriptions showing that MAA Medi-Cal Coordination, Claims Administration, and Training are part of the job of persons whose costs are direct-charged. LEAs that have “generic” position descriptions for job classifications are required to include duty statements describing the specific MAA-related responsibilities.

Related operating expenses can also be direct-charged. Examples might include travel to MAA-related training, computer equipment or programming expenses, or training materials. Claiming units using service bureaus or consultants to assist in MAA Coordination, Claims Administration, and Training may direct-charge these expenses. These items must be included in the MAA OP. Assigning a MAA account number may be useful in isolating these expenses. Direct-charging some smaller expenses, such as printing time survey forms, may not be worth the effort as all direct-charge expenses must be subtracted from overhead costs.

Note: Costs that are direct-charged on the MAA invoice may not also be included in other sections of a MAA claim.

Examples of Medi-Cal Providers Supporting Schools

The list of providers are often referred to when performing activities related to MAA Outreach, Referral, Coordination, and Monitoring; Arranging Transportation; and Program Planning, Policy Development, and Interagency Coordination.

Audiologist
Child Health and Disability Prevention Providers (CHDP)
Clinical Laboratories or Laboratories
Perinatal Services Program & Teen Pregnancy Services
County Mental Health/Rehabilitation Services Including Short-Doyle Providers
Dentists and Dental School Clinics
Dietitians
Dispensing Opticians
Early and Periodic Screening, Diagnosis, and Treatment Providers (EPSDT)
Hearing Aid Dispensers
Home Health Agencies
Hospitals
Incontinence Medical Supply Dealers
Intermediate Care Facilities including Nurse Facilities
Local Educational Agency School Providers
Medical Specialists
Nurse Services including Anesthetists, Midwives Practitioners
Nurses Licensed Visiting/Vocational Nurse (LVN) and Registered Nurse (RN)
Occupational Therapists, including California Children Services (CCS)
Optometrists and Ophthalmologists
Orthodontists
Organized Drug Detoxification Providers
Organized Outpatient Clinics (PH Clinics, Community Clinics)
Personal Care Service Providers
Pharmacies/Pharmacists
Physical Therapists including California Children Services (CCS)
Physicians
Podiatrists
Providers of Medical Transportation
Psychologists
Respiratory Therapists
Regional Center Health Services
Rehabilitation Centers
Renal Dialysis Centers and Community Hemodialysis Units
Rural Health Clinics
School Counselors with Appropriate Credentials/Licenses
Social Workers with Appropriate Credentials/Licenses
Short-Doyle Medi-Cal Providers (Mental Health Division)
Skilled Nursing Facilities
Speech-Language Pathologists and Therapists
Supplemental EPSDT Providers (Mental Health)
Trained Health Care Aide Services and Physician Assistants